

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOEL VANGHELUWE, ET AL.,	§	
	§	2:18-cv-10542-LJM-EAS
Plaintiffs,	§	
v.	§	Hon. Laurie J. Michelson
	§	
GOTNEWS, LLC, ET AL.,	§	Mag. Elizabeth A. Stafford
	§	
Defendants.	§	
	§	

PLAINTIFFS' STATUS REPORT

In response to the Court's September 22, 2020 Order, Plaintiffs submit this Status Report to (1) describe the status of the Got News' bankruptcy proceeding, (2) list all the defendants in this case, and for each defendant, his, her, or its status (e.g., Clerks entry of default, dismissed, in settlement discussions, etc.), and (3) Plaintiffs' plan for resolving their claims against any defendant that remains in the case (dispositive motion, default judgment, dismissal, settlement, etc.):

I. Got News' Bankruptcy.

The bankruptcy proceeding of Got News, LLC is still active. *In re: Got News LLC*, 2:19-BK -14693, pending in the U.S. Bankruptcy Court for the Central District of California. The Bankruptcy Trustee retained Larry D. Simons, Law Offices of Larry D. Simons to represent him. The Meeting of Creditors was held and conclude on June 5, 2020.

Mr. Simons indicated in June 2020 that he would facilitate a 2004 examination of a representative of Got News, LLC. Counsel for Plaintiffs followed up via e-mail on July 16, 2020; August 3, 2020; and September 2, 2020 for a status update with regard to that 2004 examination. No response has been received. Plaintiffs intend to seek relief from the

bankruptcy court.

II. List of All Defendants.

Below is a chart containing all defendants in this matter, a description of their status, and the ECF reference number for confirmation of their respective status.

Defendant	Status	ECF Document
1. Got News, LLC	Stayed/Bankruptcy	ECF. 110
2. Freedom Daily, LLC	Clerk's Entry of Default	ECF No. 68
3. Charles C. Johnson	Dismissed	ECF No. 125
4. Alberto Waisman	Dismissed	ECF No. 83
5. Jeffrey Rainforth	Dismissed	ECF No. 131
6. Jim Hoft	Dismissed	ECF No. 86
7. David Petersen	Clerk's Entry of Default	ECF No. 63
8. Jonathan Spiel	Clerk's Entry of Default	ECF No. 66
9. Shirley Husar	Clerk's Entry of Default	ECF No. 67
10. Eduardo Doitteau	Clerk's Entry of Default	ECF No. 64
11. Lita Coulthart-Villanueva	Dismissed	ECF No. 119
12. Kenneth Strawn	Dismissed	ECF No. 128
13. Patrick Lehnhoff	Dismissed	ECF No. 79
14. Beth Eyestone	Dismissed	ECF No. 76
15. Lori Twohy	Dismissed	ECF No. 78
16. Raechel Hitchye	Dismissed	ECF No. 80
17. James Christopher Haste	Clerk's Entry of Default	ECF. No. 65
18. Christopher Jones	Dismissed	ECF No. 77

19. Connie Comeaux	Clerk's Entry of Default	ECF No. 62
20. Gavin McInnes	Dismissed	ECF No. 61
21. Richard Weikart	Dismissed	ECF No. 94
22. Paul Nehlen	Dismissed	ECF No. 94

III. Plaintiffs' Plan for Resolution.

As summarized by the above chart, the remaining defendants are (1) Got News, LLC and (2) several defendants against whom there has been a clerk's entry of default.

For those defendants against whom there has been a clerk's entry of default, Plaintiffs intend to move for default judgment under Rule 55(b)(2). Plaintiffs anticipate a hearing will be needed for the Court to determine the amount of damages. However, if the Court prefers Plaintiffs to establish their damages through affidavit testimony, given the effect of the COVID-19 pandemic, Plaintiffs will proceed with affidavits.

Plaintiffs currently prefer for the Got News, LLC bankruptcy to resolve first, given that Got News, LLC published the article at issue, it is likely the most culpable defendant, and it is believed to have assets that can be distributed to some of the creditors in the bankruptcy proceeding. Of course, if the Court prefers Plaintiffs to move for default judgment now, Plaintiffs will comply with the Court's preferences.

Respectfully submitted,

**Sommerman, McCaffity,
Quesada & Geisler L.L.P.**

/s/ Andrew B. Sommerman

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that on October 29, 2020, the foregoing Status Report was served via ECF on counsel of record who have appeared in the case.

/s/ Andrew B. Sommerman

Andrew B. Sommerman